

To: Jayne Carlin/R10/USEPA/US@EPA[]
Cc: Don Waye/DC/USEPA/US@EPA;MikeO Cox/R10/USEPA/US@EPA[]; ikeO Cox/R10/USEPA/US@EPA[]
From: Allison Castellan <allison.castellan@noaa.gov>
Sent: Mon 8/6/2012 6:08:59 PM
Subject: Re: Proposed Coastal Time of Transfer Septic Inspection Boundaries
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Jayne,

OR's proposal to adjust boundary for OSDS inspections seems reasonable to me and would still capture the vast majority of the systems. I'll let EPA, as the technical experts, make a final decision.

Allison

On Mon, Aug 6, 2012 at 1:09 PM, Jayne Carlin <Carlin.Jayne@epamail.epa.gov> wrote:

See below.

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----- Forwarded by Jayne Carlin/R10/USEPA/US on 08/06/2012 10:06 AM -----

From: TROX Randall <TROX.Randall@deq.state.or.us>
To: Jayne Carlin/R10/USEPA/US@EPA,
Date: 08/06/2012 09:36 AM
Subject: Proposed Coastal Time of Transfer Septic Inspection Boundaries

Hello Jayne,

As discussed on previous calls, we would like to adjust the boundary for the time of transfer septic system inspection to make implementation of the program easier. The strategy proposed is to limit the time of transfer rule to counties where the bulk of the county is in the zone and not implement the rule where it is limited and the population isn't significant. The exception is Lane County where there is a good chunk both in and out of the coastal zone, so we had to try to draw it up by township and range. The proposed

boundary would be all of the following counties: Clatsop, Tillamook, Lincoln, Coos, Curry, Josephine, Jackson. Lane County boundary would be all portions of the following Townships/Ranges; 15S/07W, 16S/07W, 17S/08W, 18S/07W, 19S/06W, 20S/05W (all points westward of the afore-mentioned townships/Ranges to the Pacific Ocean are also included).

As you can see in the first attachment, the proposal to amend the boundary still captures 98% of the CNPCP boundary

I notice that Jackson and Curry are not drawn to capture the whole county and instead has the CNPCP boundary, the draft rule is written for the whole county, again to try to have a consistent implementation message on who is in and who is out. Lane County eastern boundary will be the primary challenge. The good news is the program HQ is in Lane County.

Finale: This is a request for EPA/NOAA consideration to establish the boundary as described in the first paragraph. If there is a more formal request procedure, let me know what that is.

Randy Trox
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(See attached file: CNPCP_population_analysis.xlsx)(See attached file: CNPCP_draft_Regulatory_boundary_02AUG2012.jpg)

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